



Linda S. Adams
Secretary for
Environmental Protection

Air Resources Board

Mary D. Nichols, Chairman
1001 I Street • P.O. Box 2815
Sacramento, California 95812 • www.arb.ca.gov



Arnold Schwarzenegger
Governor

November 28, 2007

Mr. Wayne Natri
Regional Administrator, Region 9
U.S. Environmental Protection Agency
75 Hawthorne Street
San Francisco, California 94105

Dear Mr. Natri:

The Air Resources Board (ARB or Board) hereby submits to the U.S. Environmental Protection Agency (U.S. EPA) for approval revisions to the California State Implementation Plan (SIP) for ozone, fine particulate matter (PM_{2.5}), carbon monoxide, and nitrogen dioxide in the South Coast Air Basin (2007 South Coast SIP), and for ozone in the Coachella Valley (2007 Coachella Valley SIP). The proposed SIP revisions incorporate emission reduction commitments from the 2007 State Strategy for the California SIP (State Strategy), which the Board adopted concurrently. The Statewide Strategy is being submitted under separate cover as it also applies to other California nonattainment areas.

Overview The South Coast Air Quality Management District (District) adopted the 2007 Air Quality Management Plan (2007 AQMP) on June 1, 2007. The District originally submitted the adopted final draft plan to ARB for approval and submittal to U.S. EPA on June 7, 2007. On October 24, 2007 the District submitted a Final 2007 AQMP to ARB that incorporated changes to prior drafts as approved by the District governing board. The 2007 AQMP demonstrates attainment of the federal annual PM_{2.5} standard in the South Coast Air Basin by 2014, and attainment of the federal 8-hour ozone standard in the South Coast Air Basin and in the Coachella Valley by 2023 and 2018, respectively. The plan also updates the region's federal carbon monoxide and nitrogen dioxide SIPs.

Ozone Attainment Demonstrations The proposed SIP revision demonstrates attainment of the federal 8-hour ozone standard in the South Coast Air Basin by 2023. It includes an emission reduction commitment for long-term measures as allowed by Section 182(e)(5) of the Act. ARB concurs with the District's request for reclassification from "severe" to "extreme" for the 8-hour ozone standard.

*The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption.
For a list of simple ways you can reduce demand and cut your energy costs, see our website: <http://www.arb.ca.gov>.*

California Environmental Protection Agency

Mr. Wayne Nastri
November 28, 2007
Page 2

The Coachella Valley lies downwind of the South Coast Air Basin. The 2007 Coachella Valley SIP demonstrates that attainment of the ozone standard in the Coachella Valley depends on emission reductions in the South Coast. Under its current serious area classification the Coachella Valley must attain the ozone standard in 2010. Because modeling documented in the SIP indicates that more time is needed, this SIP submittal requests that the Coachella Valley be reclassified to severe-15. The 2007 AQMP demonstrates that the Coachella Valley will attain the ozone standard by the resulting 2019 attainment date.

Because U.S. EPA's policy concerning demonstrations of progress in ozone nonattainment areas impacted by upwind emissions is in flux, we are not formally submitting or requesting EPA action on the reasonable further progress (RFP) demonstration for the Coachella Valley at this time. ARB staff is developing an Early Action Plan SIP revision for the Coachella Valley and other transport-impacted ozone nonattainment areas in California in consultation with Region 9 staff. We expect to solicit public comment on this proposed SIP revision later this year and to request Board approval in early 2008.

PM2.5 Attainment Demonstration The 2007 AQMP was adopted locally on June 1, 2007, prior to the ARB's approval of the State Strategy. The approved State Strategy includes control measures and emission reductions identified after local adoption of the AQMP. Air quality modeling completed by District staff prior to ARB's adoption of the State Strategy projects that the reductions identified in the approved State Strategy, together with reductions from local measures identified in the 2007 AQMP, would result in attainment of the annual average PM2.5 NAAQS in the South Coast Air Basin by the April 5, 2015 deadline. The reductions included in the model thus provided a modeled carrying capacity which is reflected in the proposed SIP revision approved by ARB.

Appendix B of the ARB Staff Report on the South Coast Plan provides ARB staff's detailed analysis of PM2.5 air quality and emission trends in the South Coast Air Basin, and what those trends imply for PM2.5 levels in the future. This analysis shows that the historic response of ambient concentrations to emission reductions has been stronger than the response predicted by the modeling. There are of course uncertainties inherent in predicting future emissions by analyzing past trends, just as there are uncertainties inherent in photochemical modeling. Nonetheless, these detailed analyses of both monitoring and filter data makes a compelling case for attainment of the PM2.5 NAAQS in the South Coast Air Basin, even before we fully realize the emission reduction commitments in the approved plan.

Federal Responsibility The PM2.5 standard presents a challenge because of the short attainment window, and because of the large emissions contributions from sources for which U.S. EPA has primary regulatory jurisdiction. The strategies already identified in the SIP are aggressive; we anticipate that incentive programs will be needed to ensure the accelerated vehicle turnover, engines replacement, and retrofit rates assumed in the SIP will occur. We cannot meet the carrying capacity identified in the SIP without the reduction or mitigation of emissions from sources under federal control. The PM2.5 attainment strategy for the South Coast Air Basin calls for 962 tons of NOx-equivalent emissions by 2014; we are asking U.S. EPA to provide less than three percent of the total 2014 NOx-equivalent reductions.

Enclosures This package consists of seven copies of the documents listed below.

- I) June 6, 2007 letter from Dr. Barry Wallerstein, District Executive Officer, to Ms. Catherine Witherspoon, ARB Executive Officer, transmitting the following materials¹:
 - A) Approved District Board Letter regarding adoption of the 2007 AQMP Revision and certification of the Final Environmental Impact Report (EIR),
 - B) District Board Resolution 07-9, certifying the Final EIR and adopting the Final 2007 AQMP,
 - C) Addendum to District Board Agenda Item 37 (June 1, 2007 Meeting) Revising District Board Resolution 07-9,
 - D) Proof of Publication for Notices of Public Hearing,
 - E) Response to Comments on the Draft 2007 AQMP (February 2007).

Other portions of the June 6, 2007 submittal have been superseded in the Final 2007 APMQ and therefore are not included in this submittal.

- II) October 24, 2007 letter from Dr. Elaine Chang, District Deputy Executive Officer, to Mr. Thomas Cackette, ARB Acting Executive Officer, transmitting the following materials:
 - A) Final 2007 AQMP (June 2007)
 - B) Final 2007 AQMP appendices:

¹ The June 7, 2007, District submittal to ARB consisted of the Draft 2007 AQMP (October 2006), and the Proposed Modifications to the Draft 2007 AQMP (February 2007). The District subsequently consolidated these documents and other revisions made at the June 1, 2007 District Board hearing into the Final 2007 AQMP. The District forwarded the Final 2007 AQMP to ARB on October 25, 2007, and requested it be submitted to U.S. EPA in place of the original draft documents.

- Appendix I – Health Effects (June 2007),
 - Appendix II – Current Air Quality (June 2007),
 - Appendix III – Base and Future Year Emission Inventories (June 2007),
 - Appendix IV-A – District's Stationary and Mobile Source Control Measures (June 2007),
 - Appendix IV-C – Transportations Control Measures (June 2007),
 - Appendix V – Modeling and Attainment Demonstration (June 2007),
 - Appendix VI – Reasonably Available Control Measures (RACM) Demonstration (June 2007),
 - C) Final Program Environmental Impact Report for the 2007 Air Quality Management Plan (June 2007), and
 - D) Final Socioeconomic Report for the 2007 Air Quality Management Plan (June 2007).
- III) Air Resources Board's Staff Report on Proposed 2007 State Implementation Plan Revisions for the South Coast Air Basin – PM_{2.5} Annual Average and 8-Hour Ozone National Ambient Air Quality Standards (released September 21, 2007), with appendices.
- IV) Air Resources Board's Proposed State Strategy for California's 2007 State Implementation Plan (released April 26, 2007) with Attachment A: Technical and Clarifying Modifications to April 26, 2007 Revised Draft Air Resources Board's Proposed State Strategy for California's 2007 State Implementation Plan and May 7, 2007 Revised Draft Appendices A through G; and Attachment B: Proposed Modifications to the Air Resources Board's Proposed State Strategy for California's 2007 State Implementation Plan that will Achieve 30 Tons Per Day of Additional Emission Reductions in the South Coast by 2014 and 26 to 31 Tons Per Day of Additional Emission Reductions in the San Joaquin Valley by 2017.
- V) Public notice evidence and transcript for the ARB Public Hearing to Consider Approval of the 2007 Air Quality Management Plan for Attaining the Federal 8-Hour Ozone and PM_{2.5} Standards in the South Coast Air Basin and Coachella Valley.
- VI) ARB Board Resolution 07-41, adopting the 2007 South Coast Air Basin and Coachella Valley revisions to the California SIP.

Mr. Wayne Nastri
November 28, 2007
Page 5

- VII) Written comments received by ARB on the proposed 2007 South Coast Air Basin and Coachella Valley revisions to the California SIP.
- VIII) Completeness Checklist for the 2007 South Coast Air Basin and Coachella Valley SIP.

The following portions of the Final 2007 AQMP address requirements specific to California law or are sections superseded by the adoption of the State Strategy, and are excluded from this SIP submittal:

- California Clean Air Act Requirements (pages 6-13 through 6-22),
- Control Measure Ranking (page 7-3),
- District Staff's Proposed Policy Options to Supplement CARB's Control Strategy (pages 4-43 through 4-54), and
- Recommended Mobile Source and Clean Fuel Control Measures, Table 7-3, (pages 7-8 and 7-9).

This SIP submittal also includes the supplementary material listed below, which is specific to the adoption of the conformity budgets. We request an expedited finding of adequacy for the South Coast Air Basin conformity budgets.

- Proof of Publication for Notices of Public Hearing
- Conformity budget information provided on ARB's website
- Board Book description of proposed action
- Board Item Summary
- ARB Board Resolution 07-50 adopting the Transportation Conformity Budgets for the South Coast Air Basin and the Coachella Valley

The transcript for the November 14 Board meeting is not yet available; once it is complete, we will provide the appropriate portions of the transcript to you under separate cover.

Conformity budgets for the South Coast Air Basin and the Coachella Valley were adopted in the same Board action and therefore are both included in this transmittal. However, we are not formally submitting the Coachella Valley conformity budgets at this time. We will formally submit the conformity budgets for the Coachella Valley following ARB's approval of the Early Progress Plan for transport-impacted ozone nonattainment areas.

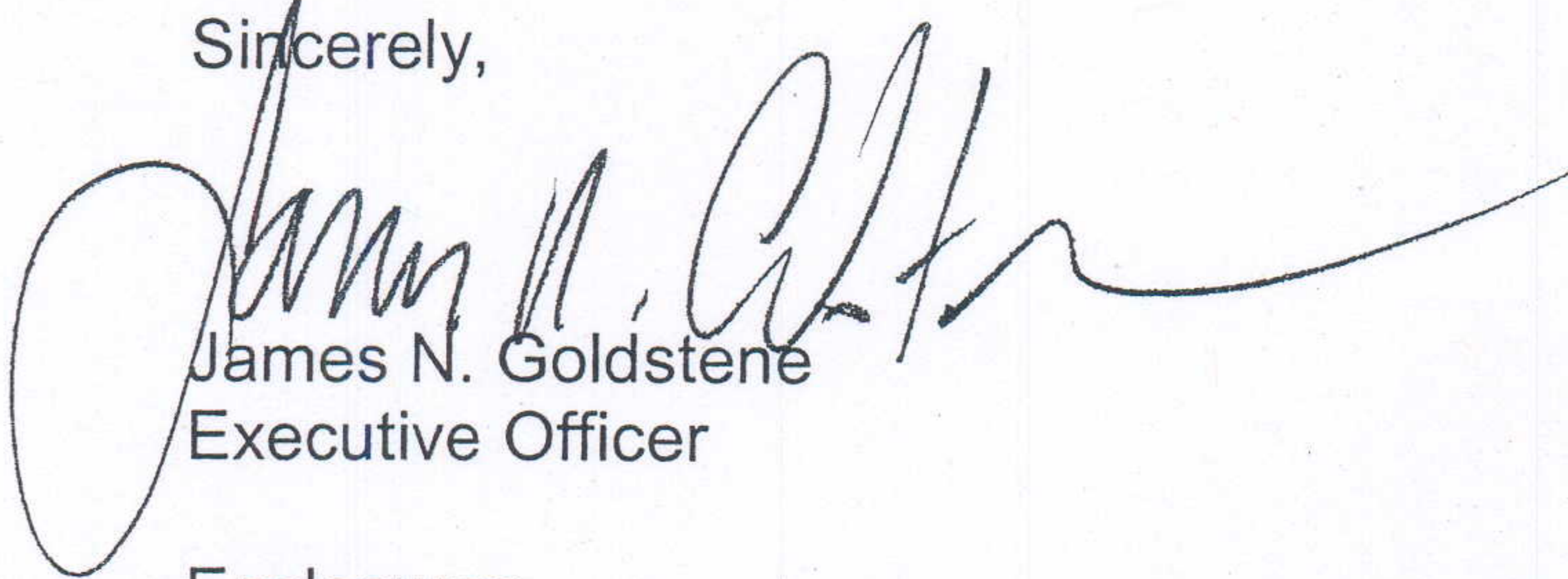
Mr. Wayne Nastri

November 28, 2007

Page 6

We look forward to working with you to secure the approval of this SIP revision, and will continue to work with your staff to resolve technical issues related to U.S. EPA approval. If you have any questions, please feel free to call me, at (916) 445-4383, or Ms. Lynn Terry, Deputy Executive Officer, at (916) 322-2739. For questions of a technical nature, please have your staff contact Mr. Kurt Karperos, Chief, Air Quality and Transportation Planning Branch, at (916) 445-5610.

Sincerely,



James N. Goldstene
Executive Officer

Enclosures

cc: (With Board Resolutions 07-41 and 07-50 only)

Dr. Deborah Jordan, Director
Air Division, Region 9
U.S. Environmental Protection Agency
75 Hawthorne Street
San Francisco, California 94105

Mr. Mark Pisano
Executive Director
Southern California Association
of Governments
818 W. Seventh Street, 12th Floor
Los Angeles, California 90017

Dr. Barry Wallerstein
Executive Officer
South Coast Air Quality
Management District
21865 Copley Drive
Diamond Bar, California 91765

Ms. Lynn Terry, EO

Mr. Kurt Karperos, PTSD